



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 15, 2008

MEMORANDUM:

Subject: EPA Reg. No.: 66675-4/Magna-Bon Pro Teck
DP Barcode: 356274
Case No.: 0636

From: Marianne Lewis, Biologist
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

To: Veronica Dutch, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508C)

Applicant: Magna-Bon II, LLC
1531 NW 25th Drive
Okeechobee, FL 34972

Marianne Lewis 9/15/08

FORMULATION FROM EPA Reg. No. 66675-4 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Copper sulfate pentahydrate	19.8%
<u>Inert Ingredient(s):</u>	<u>80.2%</u>
Total	100.0%

BACKGROUND: In the 8 month response to the Coppers RED, the registrant is requesting waivers for four (81-2, 81-4, 81-5, 81-6) of the acute toxicity studies and is submitting an acute inhalation study (81-3) to support the reregistration of their product, EPA Reg. No. 66675-4. The basis for this request is that the pH of the subject product is < 2 . The request to waive the four (81-2, 81-4, 81-5, 81-6) studies is granted. The acute inhalation study (81-3) was conducted by Product Safety Labs and the test material used in the study was the subject product.

RECOMMENDATIONS:

- The request to waive four (81-2, 81-4, 81-5, 81-6) of the acute toxicity studies is granted.
- The acute inhalation study (81-3) submitted is acceptable to support the reregistration of EPA Reg. No. 66675-4.
- The registrant is reminded to cite or submit an acute oral study (81-1).

The acute toxicity profile for EPA Reg. No. 66675-4 is currently:

Acute Oral		Data Needed
Acute Dermal	I	Waived
Acute Inhalation	IV	Acceptable
Primary Eye	I	Waived
Primary Dermal	I	Waived
Skin Sensitization	non sensitizer	Waived

NOTE: The labeling will be completed upon receipt of the required information.

DATA REVIEW FOR ACUTE INHALATION TOXICITY TESTING (§81-3, 870.1300)

Product Manager: Marshall Swindell, 33
MRID No.: 475206-03

Reviewer: Marianne Lewis
Study Completion Date: 8/18/08
Report No.: 25507

Testing Facility: Product Safety Labs
Author: G. Moore

Quality Assurance (40 CFR §160.12): Included

Test Material: Pro-Teck, EPA Reg. No. 66675-4, clear blue liquid

Species: Sprague-Dawley derived albino rat
Weight: males = 355 - 381 g; females = 224 - 251 g
Age: young adult
Source: Ace Animals, Inc.

Summary:

1. **LC₅₀ (mg/L):** > 2.10 mg/L

2. **MMAD:** 2.4 µm

GSD: 2.02

3. **Tox. Category:** IV

Classification: Acceptable

Procedure (Deviation From §81-3): none

Results: Reported Mortality

Exposure Concentration	(number deaths/number tested)		
	Males	Females	combined
2.10 mg/L	0/5	0/5	0/10

Chamber Atmosphere		
Dose Level mg/L	MMAD	GSD
2.10	2.4 µm	1.88
	2.4 µm	2.02

Chamber Environment	Dose Level mg/L
	2.10
Chamber Volume	6.7 L
Airflow	25.6 – 25.8 Lpm
Temperature (°C)	20 - 22
Relative Humidity %	68 - 73

Clinical Observations: Two lost weight between days 0 & 7, then all gained weight over the course of the study. All appeared active and healthy.

Gross Necropsy Findings: No observable abnormalities noted.